

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
(EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands  
corporation, and TS Production LLC, a Hungarian  
limited liability company,

Plaintiffs,

vs.

Dan Hollings, Arizona residents, and Web Services,  
LLC, an Arizona limited liability company,

Defendants.

Case No. 07 C 6518

(Assigned to the Hon. Ronald A. Guzman)

Status Hearing Date: August 29, 2008

**STATUS REPORT AND PROPOSED DISCOVERY PLAN**

The parties, by and through undersigned counsel, hereby submit this status report and proposed discovery plan.

**Case Status**

On February 11, 2008, the parties appeared before this Court for an initial status hearing. At that hearing, the Court granted the parties' agreed motion to postpone merits discovery pending the Court's decision on the Defendants' motion to dismiss for lack of personal jurisdiction, which they filed February 6, 2008.

On May 8, 2008, Dan Hollings filed a complaint against Rhonda Byrne, Prime Time U.S., Inc., The Secret, TS Holdings, TS Merchandising Ltd., TS Production LLC, and other defendants in the Central District of California. The defendants moved to transfer the C.D. Cal. case to this district. The California plaintiffs opposed the transfer motion.

On June 26, 2008, the Court granted the Defendants' motion as to Loretta Hollings and dismissed her from the case. The Court denied the motion as to Dan Hollings and Web Services, LLC. On July 29, 2008, after this Court denied the motion to dismiss this case against Dan Hollings and Web Services, the parties consented to transferring the California case to this district. On August 1, 2008, the case was transferred to this district and assigned Case No. 08-

cv-4369, before the Honorable Judge Gottschall. On August 29, 2008, the parties will present their agreed motion to reassign Case No. 08-cv-4369 as related to the case for consolidated handling before this court.

**Proposed Discovery Plan**

The parties submit the following proposed discovery plan for the court's consideration:

1. The parties shall exchange Initial Disclosures as defined in Federal Rule of Civil Procedure 26(a) no later than **November 10, 2008**.

2. Motions pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, motions to amend the complaint and motions to join additional parties shall be filed no later than **November 17, 2008**.

3. The parties shall disclose their expert witnesses and reports no later than **May 22, 2009**. Rebuttal experts, if any, shall be disclosed no later than **June 12, 2009**.

4. All discovery, including depositions of parties, witnesses, and experts, answers to interrogatories, supplements to interrogatories, requests for admissions and requests for production of documents must be completed by **July 3, 2009**.

5. Supplemental disclosures and discovery responses shall thereafter be made as required by Rule 26(e) of the Federal Rules of Civil Procedure.

6. All dispositive motions shall be filed no later than **July 24, 2009**.

7. The parties request that the Court set a status hearing upon resolution of all dispositive motions. In the event no dispositive motions are filed, the parties request that the Court set a status hearing upon the passing of the dispositive motion deadline. At the status hearing, deadlines will be set for the filing of the Joint Proposed Pretrial Order and all Motions in Limine. A Final Pretrial Conference and a firm Trial date will also be set at the status hearing

**RESPECTFULLY SUBMITTED** this 22<sup>nd</sup> day of August, 2008.

/s/Christopher I. Cedillo  
Brian A. Cabianca  
Christopher I. Cedillo  
SQUIRE, SANDERS & DEMPSEY L.L.P.  
40 North Central Avenue, Suite 2700  
Phoenix, Arizona 85004-4498  
-and-  
Jessica E. DeMonte  
SQUIRE, SANDERS & DEMPSEY, LLP  
Three First National Plaza  
70 W. Madison, Suite 2015  
Chicago, IL 60602  
*Attorneys for TS Merchandising Ltd. and  
TS Production LLC*

/s/ Jessica C. Lawrence  
Christopher E. Parker  
Jessica B. Lawrence  
Mozley, Finlayson & Loggins LLP  
One Premier Plaza, Suite 900  
5605 Glenridge Drive  
Atlanta, Georgia 30342  
-and-  
John Ruskusky  
ARDC 6256605  
Ungaretti & Harris LLP  
3500 Three First National Plaza  
70 West Madison  
Chicago, IL 60602  
*Attorneys for Dan and Hollings and Web  
Services LLC*

I hereby certify that on August 22, 2008, I electronically transmitted the attached document to the Clerk's office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Brian A. Cabianca  
Christopher I. Cedillo  
SQUIRE, SANDERS & DEMPSEY L.L.P.  
40 North Central Avenue, Suite 2700  
Phoenix, Arizona 85004-4498  
-and-  
Jessica E. DeMonte  
SQUIRE, SANDERS & DEMPSEY, LLP  
Three First National Plaza  
70 W. Madison, Suite 2015  
Chicago, IL 60602  
*Attorneys for TS Merchandising Ltd. and TS Production LLC*

**COPY** of the foregoing and Notice of Electronic Filing to be  
Delivered by Federal Express on August 25, 2008, to:

Honorable Ronald A. Guzman  
United States District Court  
Everett McKinley Dirksen Building  
219 S. Dearborn Street, Room 1278  
Chicago, IL 60604

By: s/ Jessica C. Lawrence